

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

**OLGA DELACRUZ AND MARCO
DELACRUZ, INDIVIDUALLY, AND
AS REPRESENTATIVES OF THE
ESTATE OF MANUEL DELACRUZ,
Plaintiff**

VS.

THE CITY OF PORT ARTHUR, PORT
ARTHUR POLICE DEPARTMENT,
OFFICER LANE CHERRY, IN HIS
INDIVIDUAL AND OFFICIAL
CAPACITY, UNKNOWN OFFICERS,
THE MEDICAL CENTER OF
SOUTHEAST TEXAS, L.P. D/B/A
THE MEDICAL CENTER OF
SOUTHEAST TEXAS L.P.,
Defendants

CIVIL ACTION NO. 1:18-CV-11

JOINT MOTION FOR FINAL ORDER OF DISMISSAL

COMES NOW Plaintiffs, OLGA DELACRUZ and MARCO DELACRUZ, Individually and as Representatives of the Estate of MANUEL DELACRUZ in the above-entitled and numbered cause, and Defendants, CITY OF PORT ARTHUR, OFFICER LANE CHERRY, OFFICER SHANNON MEAUX, OFFICER REID ROWE, OFFICER SHELBY HARPER AND OFFICER TERRY CATER, and respectfully aver that all claims and demands asserted and involved against and between them should be dismissed, and respectfully request the following:

That the Plaintiff's Original Petition and all amendments thereto, against the Defendants be dismissed with prejudice.

That the legally taxable costs involved in this action shall be assessed against the parties incurring same.

Any and all causes of action by and between the parties, whether by direct action or by cross-claim, asserted or not in this litigation, have been released and are requested to be Dismissed with Prejudice.

WHEREFORE, PREMISES CONSIDERED, the parties, by and through their respective attorneys, respectfully move the Court to enter a Final Order of Dismissal.

Respectfully submitted,

ABRAHAM, WATKINS, NICHOLS, SORRELS,
AGOSTO & AZIZ

By: 

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By: 

Frank D. Calvert
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ATTORNEYS FOR DEFENDANTS,
THE CITY OF PORT ARTHUR AND
THE PORT ARTHUR POLICE
DEPARTMENT. OFFICER MEAUX,

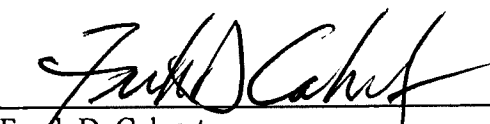
**OFFICER CHERRY, OFFICER ROWE,
OFFICER HARPER AND OFFICER CATER**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was furnished to all counsel of record by:

XX Electronic Service

on this 16th day of July, 2019.



Frank D. Calvert